

## **Exhibit 12**

**From:** [Lori Cora](#)  
**To:** [Cora, Lori](#)  
**Subject:** Fw: CONFIDENTIAL -- DO NOT DISTRIBUTE -- Settlement Negotiations with Linnton Plywood Association  
**Date:** Tuesday, February 10, 2015 2:51:23 PM  
**Attachments:** [Attachment 1 LPA response.pdf](#)  
[Attachment 2 LPA response.pdf](#)  
[LPAresponse.pdf](#)

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LCT communication

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Forwarded by Lori Cora/R10/USEPA/US on 02/10/2015 02:50 PM

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Cc: Kristine Koch/R10/USEPA/US@EPA  
Date: 02/11/2010 10:05 AM  
Subject: CONFIDENTIAL DO NOT DISTRIBUTE Settlement Negotiations with Linnton Plywood Association

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Hello, Everyone. I am writing to provide an update on the settlement discussions EPA is having with the Linnton Plywood Association. In accordance with the confidentiality provisions of the MOU, please hold this information in confidence.

LPA is a cooperative corporation, which means the workers were the shareholders but they also had to reinvest their earnings into the corporation to provide capital operating resources. As you know, the company closed its business and has been seeking to dissolve since 2001. It has a couple tenants on its property, but they claim that their expenses continue to exceed the rental income they receive. The veneer plant property is the last remaining asset they have. BP Products, the next door neighbor, was interested in purchasing the property which lead to LPA's request to EPA for a settlement. Recently, BP withdrew its purchase and sale agreement, but LPA is still interested in settling CERCLA liabilities so that it can market the property and distribute the proceeds of sale to its worker members. I am told LPA is discussing settling of its NRD claims with the Trustees too.

Because the company is dissolving and seeking to sell the property and has limited resources, EPA has decided that it will attempt to negotiate a settlement with the company so that some money may be recovered to put towards the harbor cleanup. The settlement will seek to recover what funds there may be after the liabilities/debts of the corporation are paid. EPA this week rejected LPA's first offer, and indicated we believed a significantly larger amount of money was available to settle our claims.

Our response letter and the attachments are enclosed. We would like to be kept apprised of the NRD settlement discussions as well. Please call me if you would like to discuss.

*(See attached file: LPAresponse.pdf)(See attached file: Attachment 1 LPA response.pdf)(See attached file: Attachment 2 LPA response.pdf)*

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